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14 **UNITED STATES DISTRICT COURT**  
15 **DISTRICT OF NEVADA**

16 EDUARDO WADE,

17 Plaintiff(s),

18 vs.

19 AMERICAN EXPRESS,

20 Defendant(s).

Case No.: 2:22-cv-01158-GMN-VCF

21 **UNOPPOSED MOTION FOR**  
22 **EXTENSION OF TIME FOR**  
23 **DEFENDANT AMERICAN**  
24 **EXPRESS TO ANSWER**  
25 **COMPLAINT**

26 **(First Request)**

27 The current deadline for American Express (“AMEX”) to respond to the Complaint is August 12,  
28 2022. Plaintiff’s counsel has been in communication with AMEX’s general counsel (not licensed in  
Nevada) and AMEX has requested, and Plaintiff has agreed, to extend the deadline to and including  
September 12, 2022 to Plaintiff’s Complaint. The purpose of the extension is to allow time for AMEX

1 to locate the relevant files, explore possible early settlement and retain local counsel. The request for an  
2 extension is made in good faith and not for the purposes of delay.

3 Dated: July 29, 2022.

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5  
6 /s/ Shawn W. Miller

7 David H. Krieger, Esq.

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13 *Attorneys for Plaintiff*

14  
15 **ORDER GRANTING EXTENSION OF TIME**

16 IT IS SO ORDERED.

17 

18 UNITED STATES MAGISTRATE JUDGE

19 8-1-2022

20 Dated: \_\_\_\_\_